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| 11 | TESLA INC. | | |
| 12 | [additional counsel listed in signature block] | | |
| 13 | UNITED STATES DISTRICT COURT | | |
| 14 | NORTHERN DISTRICT OF CALIFORNIA | | |
| 15 | SAN FRANCISCO DIVISION | | |
| 16 | ZACHERY WILLIAMS and MICHAEL MA, on behalf of themselves and all others similarly | Case No. 4:20-cv-08208-HSG | |
| 17 | situated, | REVISED STIPULATION AND | |
| 18 | Plaintiffs, | ORDER TO CONTINUE THE CASE MANAGEMENT CONFERENCE AND | |
| 19 | v. | CONTINUE TO STAY PLAINTIFF ZACHARY WILLIAMS' CLAIMS | |
| 20 | TESLA, INC. and DOES 1 through 10, | (as modified) | |
| 21 | inclusive, | | |
| 22 | Defendants. | | |
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4816-3229-3616 v1

Stipulation Case No.: 4:20-cv-08208-HSG

| 1 | IT IS HEREBY STIPULATED by and between Plaintiffs Zachery Williams and Michael N | |
|----|---|--|
| 2 | ("Plaintiffs") and Defendant Tesla Inc. ("Tesla") (collectively, the "Parties"), by and through their | |
| 3 | respective counsel of record, that: | |
| 4 | WHEREAS, on November 20, 2020, Plaintiffs filed their complaint (Dkt. 1); | |
| 5 | WHEREAS, on November 25, 2020, Plaintiffs filed their Amended Complaint (Dkt. 7); | |
| 6 | WHEREAS, per the parties' stipulation, the Court continued the Case Management | |
| 7 | Conference, originally set for April 6, 2021, to July 6, 2021 to allow for the Court's decision on | |
| 8 | Tesla's motion to dismiss Ma's claims (Dkt. 34); | |
| 9 | WHEREAS, on June 21, 2021, the Court granted Tesla's motion to dismiss Ma's claims with | |
| 10 | leave to amend several of the claims within 28 days of the date of the order (Dkt. 44); | |
| 11 | WHEREAS, Plaintiffs' deadline to file the Second Amended Complaint ("SAC") is July 19, | |
| 12 | 2021; | |
| 13 | WHEREA24S, the parties met and conferred and agree that it would promote judicial | |
| 14 | efficiency if the Court continues the Case Management Conference currently scheduled for July 6, | |
| 15 | 2021 to August 24, 2021 to allow Plaintiffs to file their SAC and to allow Tesla to evaluate the SAC | |
| 16 | WHEREAS, per the parties' stipulation, the Court stayed Plaintiff Williams' claims until | |
| 17 | after the Court issued its order on Tesla's motion to dismiss Plaintiff Ma's claims (Dkt No. 34); | |
| 18 | WHEREAS, the parties stipulate and agree that it would conserve judicial and party | |
| 19 | resources and promote efficiency if the Court continue to stay Plaintiff Williams' claims until the | |
| 20 | Case Management Conference; | |
| 21 | THEREFORE, the Parties respectfully request the Court to order that: | |
| 22 | (1) The Case Management Conference is continued to August 24, 2021 and | |
| 23 | (2) Plaintiff Williams' claims are stayed until the Case Management Conference. | |
| 24 | IT IS SO STIPULATED. | |
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| | Detail, July 2, 2021 | Dean actfully, submitted |
|----|--------------------------------------|--|
| 1 | Dated: July 2, 2021 | Respectfully submitted, McCUNE WRIGHT AREVALO, LLP |
| 2 | | By: /s/ David C. Wright Mark I. Richards |
| 3 | | Steven A. Haskins David C. Wright |
| 4 | | |
| 5 | | Attorneys for Plaintiffs ZACHERY WILLIAMS and MICHAEL MA |
| 6 | Dated: July 2, 2021 | SHOOK HARDY & BACON L.L.P. |
| 7 | | By: /s/ Michael L. Mallow Amir Nassihi |
| 8 | | Michael L. Mallow Rachel A. Straus |
| 9 | | Nalani Crisologo |
| 10 | | Attorneys for Defendant |
| 11 | | TESLA, INC. |
| 12 | | |
| 13 | | |
| 14 | | ncurrence in the filing of this document has been |
| 15 | obtained from the other signatories. | |
| 16 | | By: <u>/s/ Michael L. Mallow</u> Michael L. Mallow |
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Case No.: 4:20-cv-08208-HSG

ORDER

Having considered the parties' stipulation, and good cause showing, the Court hereby orders the following:

IT IS SO ORDERED.

- (3) The Case Management Conference is continued to August 24, 2021 at 2:00 p.m. and
- (4) Plaintiff Williams' claims are stayed until the Case Management Conference.

Dated: 7/6/2021

HONORABLE HAYWOOD S. GILLIAM JR. U.S. DISTRICT COURT JUDGE